

REMARKS

Claims 2, 5, 6, 9 and 12 are canceled without prejudice.

1. The Applicants request that the foregoing amendment be entered under Rule 116(c) and that the claims be allowed to issue. The above-identified amendments were not previously made because the Applicants believed that the claims as previously amended were allowable. In light of the Examiner's most recent Office Action, the teachings of the prior art are more well-understood and the claims as amended above, clearly avoid the cited references for the reasons set forth below.

2. In particular, claims 1 and 8 were rejected under 35 U.S.C. §112, ¶6. The Examiner alleged that the specification does not provide adequate support to substantiate the notion that fields of video from two separate channels can occur adjacent in time' as claimed. Claims 1 and 8 have been amended to delete the claim limitation that required the video fields received from two separate channels to be "adjacent in time." The rejection of claims 1 and 8 under 35 U.S.C. §112, ¶6 should be withdrawn.

3. Claims 8, 9 and 11 were rejected under 35 U.S.C. §102(b) as being anticipated by the Dangschat reference.

Independent claim 8 has been carefully amended. Among other things, claim 8 now requires the step of interpolating video data between the frames that are actually received on a channel. Interpolating the video between received fields and displaying the interpolated video will smooth the displayed information, improving the video quality displayed on the display device.

Dangschat does not show or suggest video interpolation. An electronic search of the Dangschat text revealed that the words "interpolate" "interpolation" and "interpolating" do not appear anywhere in the Dangschat reference. Support for the newly-added "interpolating" limitation is found in the specification on page 2, line 24 through page 3, line 1; page 4, lines 6-14 where a specific method of interpolation is disclosed; page 9, lines 3-5.

Dependent claim 9 has been cancelled without prejudice.

Dependent claim 11 now claims that both video fields received on both channels is interpolated.

In light of the amendments to claims 8 and 11, the rejection of these claims under 35 U.S.C. §102(b) should be withdrawn.

4. Claims 1, 3, 5 and 6 were rejected under 35 U.S.C. §103(a) as being unpatentable over Dangschat in view of Shirahata. The obviousness rejection should be withdrawn for two reasons. First, as set forth below, the combination of Dangschat and Shirahata was improper. Secondly, the claims as amended require the interpolation of video between frames that are received but which are not adjacent in time. The interpolated video is displayed between received frames so as to smooth out the displayed video. Neither reference teaches this.

A. It was improper to combine Shirahata with Dangschat.

The Examiner should know that references can be combined to render a claim as "obvious" if there is some teaching, suggestion, or motivation to combine them. The teaching,

suggestion or motivation to combine references can be found in either the references themselves, or in other prior art.

For at least two reasons, no one of ordinary skill in the video art would combine Shirahata with Dangschat as the Examiner has done.

First, Shirahata teaches that "[a]n object of the [Shirahata] invention is to...generate a frame image for a high-quality still picture ... from a ...moving picture." (Emphasis added.) Why would anyone of ordinary skill in the art, combine a method for producing a still image, with a method for capturing only parts of a video signal as disclosed in Dangschat? The result of combining these two references is a still picture; not a picture-in-picture video display. The Examiner has presented no teaching, no motivation and no suggestion to combine a method for producing a still picture, (i.e., Shirahata) with a method for tuning a single video tuner to two different frequencies, (i.e., Dangschat).

Secondly, combining Dangschat with Shirahata would not even yield the result Shirahata is seeking because Shirahata requires consecutive video images, which Dangschat cannot provide. (See the second and third paragraphs of the Summary of the Invention. See also the second paragraph of the Detailed Description.) The method of Dangschat does not and cannot provided the consecutive images required by Shirahata's method. No one of ordinary skill in the art would use Dangschat's method to achieve the result sought by Shirahata. The combination of these two references was improper and the rejection of claims 1, 3, 5 and 6 as being "obvious" was improper.

B. The claims as amended avoid the two references.

The independent claims as amended require the interpolated video data to be displayed between the two temporally-separated video fields received on a particular frequency. Interpolating the video and displaying it will smooth the video appearance.

Neither Dangschat nor Shirahata teach, suggest or disclose the display of interpolated video data. Accordingly, neither of them invalidate the claim limitations for which protection is sought and to which the applicants are entitled.

Entry of the amendments above and allowance of the claims is respectfully requested.

Respectfully submitted,

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